

## Vegetation Management standards

The following are the recommendations the group wishes to have included in the final draft. These are some of the main points that we have always been firm on. In fact, some of the issues are how this started and it still is extremely important.

**14:5-8.1 Definitions** Delete “1994” from specs. Document name will not change over the years and as updates occur there will be no need to revise. Latest revision is 2000 anyway.

**Vegetation Management** – Add pruning and trimming to the definition. “Vegetation management means removing, pruning, and trimming trees and/or other vegetation...”  
This will be consistent with 14:5-8.5(c).

Nowhere in the document are the words **“Certified Tree Expert”**. This is critical to the success of the new standards and the reason we were in the situation. To keep this out of the document would not solve the original problem. Utilities change, management change, personnel change and consistent with public hearing and municipal correspondence, this will insure utility consistently retaining qualified tree experts. Omitting this will not solve the problem or make the issue go away. Under 14:5-8.5(b),

*“Each electric public utility shall employ a vegetation manager (VM). The VM shall be a utility employee, not a contractor, who is **“a Certified Tree Expert and”** responsible for all aspects of the utilities vegetation management program, and for insuring compliance with this subchapter. **If the VM is not a CTE, at least one CTE is required to be on staff.***

Currently, all utilities have CTE on staff now. JCP&L has 6 or more, PSEG has three or more, and Connective has one or more. O & R I believe has at least one. This very issue is at the core of the problem and is the answer to it. Requiring at least one CTE is the same as requiring Engineers and other qualified personnel. The utilities already have them, simple solution.

14:5-8.7 Seven day notice to residents is insufficient. When dealing with the shore communities, the municipalities do not allow tree trimming during the season for obvious reasons. During the off season is when the owners are absent. Notice given to those homes as currently outlined may not get to the owners for a while, and therefore those people need more time to respond. A minimum of 14 days is required.

Finally, where is accountability? If the utilities fail to comply what is the penalty when notification fails, or when trimming is poor and not to standards, or when removals are done without permission? A section should include **“Any person, firm, corporation, or entity found to have violated provisions of subchapter 8 shall be subject to ..... (whatever is appropriate to BPU standards) “and further subject to cease such violation and take appropriate corrective action””**.

This has been a long and arduous journey and too late to turn back without addressing the CTE issue. Our group is still concerned that what is proposed is window dressing and does not hit at the core. CTE’s and accountability. Commissioner Murphy and the public heard what is important and they agreed. This document fails to meet that expectation.

Respectfully submitted,

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For the Committee for the Advancement of Arboriculture